May 15, 2018

Kurt Messner  
Regional Administrator  
Northeast Region  
USDA Food & Nutrition Service

Dear Mr. Messner,

Over the past 18 months, the Rhode Island Department of Human Services (RI DHS) has made substantial progress in stabilizing RIBridges and ensuring timely and accurate administration of SNAP benefits to Rhode Islanders. The team’s focused work in partnership with the Integrated Eligibility System vendor to make operational and technical improvements have resulted in the reduction of pending application backlogs, improvement in the timeliness of processing new applications and recertifications, reduction of cases blocked by system defects and improved accuracy of benefit determination.

RI DHS is committed to ensuring that we continue to make progress to resolve outstanding technical issues, improve the SNAP customer experience and improve overall program integrity and has outlined our plan to achieve these goals in this submission. We appreciate the support that FNS has provided to our State and look forward to our further partnership in the future.

**Key Indicators of Progress:**

Timeliness is steadily improving. The State reviews pending SNAP applications on a daily basis. The chart below represents the number of overdue pending applications on 5/6/18 and is typical of the daily throughput reviewed by the team. Additionally, SNAP timeliness for the month of April 2018 averaged 90%.
SNAP Pending Applications

SNAP Expedited
Needs Client Action | DHS Responsibility Status
---|---
22 | 16
49 | 3

SNAP Non-Expedited
Needs Client Action | DHS Responsibility Status
---|---
453 | 119
572 | 61

SNAP Timeliness

<table>
<thead>
<tr>
<th>Month</th>
<th>Expedited</th>
<th>Non-Expedited</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>2,731</td>
<td>2,336</td>
</tr>
<tr>
<td></td>
<td>12.3%</td>
<td>17.0%</td>
</tr>
<tr>
<td></td>
<td>87.7%</td>
<td>83.0%</td>
</tr>
<tr>
<td>February</td>
<td>2,585</td>
<td>2,327</td>
</tr>
<tr>
<td></td>
<td>14.5%</td>
<td>32.4%</td>
</tr>
<tr>
<td></td>
<td>85.5%</td>
<td>67.6%</td>
</tr>
<tr>
<td>March</td>
<td>2,763</td>
<td>2,169</td>
</tr>
<tr>
<td></td>
<td>12.2%</td>
<td>22.1%</td>
</tr>
<tr>
<td></td>
<td>87.8%</td>
<td>77.9%</td>
</tr>
<tr>
<td>April</td>
<td>2,374</td>
<td>2,000</td>
</tr>
<tr>
<td></td>
<td>99.1%</td>
<td>99.2%</td>
</tr>
<tr>
<td></td>
<td>0.9%</td>
<td>0.8%</td>
</tr>
</tbody>
</table>

All data is preliminary and draft.
Additionally, RIDHS is improving timeliness in the processing of recertifications in the month required.
Planned Corrective Action as organized through focus areas in “People, Process & Technology”

I. People

Supporting the RI DHS workforce to ensure that we have enough well-trained, well-supported employees is critical to our work moving forward.

1.1 Hiring

RI DHS has experienced high turnover over the past 18 months which has caused operational challenges. To overcome this, the DHS team is working to both reduce turnover and increase the flow of new employees into the department.

In order to fill these vacancies in the most efficient and effective method possible, DHS in collaboration with DOA/HR have created a Hiring Strategy which includes a more strategic sequencing of positions to reduce the movement of employees across the department, special agreements with the union to reduce posting times and a one time “bidding” process to provide staff with the opportunity to move to their preferred location based on seniority. Over the past 6 months DHS has added 107 positions and currently has more staff working in program operations than it has had since the lay-offs in October 2016.

Additionally, we have built a SNAP team with 40 ETs whose priority is SNAP. They work incoming SNAP requests for benefits and verifications before anything else. In formalizing this team, we have seen the number of cases worked per worker per day double from 6 in November to 12 in April. This same team also processes recertifications.

Positions currently in progress:

<table>
<thead>
<tr>
<th>Position</th>
<th>Number of vacancies</th>
<th>Estimated completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Service Aides</td>
<td>31</td>
<td>July 15</td>
</tr>
<tr>
<td>Eligibility Technicians (not all SNAP)</td>
<td>21</td>
<td>August 30</td>
</tr>
<tr>
<td>Senior ET, Casework Supervisor and SCW</td>
<td>11</td>
<td>July 30</td>
</tr>
</tbody>
</table>

RI DHS recognizes that shifting to a process for continuous recruitment is critical to reducing the number of vacancies and ensuring that we have appropriate staffing levels in our programs at all time. The team is working in partnership with the State’s HR department and our union partners to implement further process improvements to try to reduce the amount of time it takes to fill a position in the future. The department has set a goal of ensuring that the number of open eligibility technician positions does not exceed 15% of total eligibility technician positions at any point in time and we will work over the coming months to achieve this target.

1.2 Training

The Center for Staff Development and Learning (CSDL), formerly the Staff Development Unit, has steadily been revising and enhancing its comprehensive training plan for RI DHS employees. The training team underwent a transformation and has shifted its learning management practices to mirror that of a learning
development center (LDC) which includes a range of on-the-job and off-the-job methods for acquiring necessary knowledge, skills and behaviors. The CSDL team has developed and begun to implement a competency-based training curriculum for all staff. The curriculum addresses how RI DHS welcomes new employees to the agency while supporting existing employees as the agency stabilizes and strengthens its core business process.

The training model that has been outlined begins with an overview of our New Hire Orientation and Training Program; then highlights Employee Engagement strategies; a Supervisory Training Program to build leadership through targeted development of managers; and our efforts to ensure the end-to-end training curriculum includes representatives from EOHHS, HSRI, and Department of Children, Youth and Families (DCYF).

**New Hire Orientation and Training**

The New Employee Orientation (NEO) Program is the first step in welcoming new hires to RI DHS. Its main objective is to familiarize new employees with the organization, its organizational structure, and its policies and procedures. It covers the following topics; Mission, Vision, Organizational Structure, and mandated trainings on Confidentiality, Americans with Disabilities Act (ADA), Heath Insurance Portability Accountability Act (HIPAA), employee expectations and RI DHS policies. Following this orientation, the new employees will be required to move into one of the nine specialized tracks (see chart below). The All Programs Track is the foundational track for many RI DHS positions. We expect this track will take an estimated 6 months to complete. It combines classroom learning (10 days for each program SNAP, RIW, Medicaid, etc.) with field experience (2-4 weeks) in between tracks.

After classroom training concludes, the new hires will report to their assigned field offices to apply their learnings. During the field portion of the training, CSDL will provide field supervisors with a checklist that will help assess the new hires competencies. The training checklist will be returned to CSDL trainers before the next rotation. The information gathered will help CSDL trainers adjust training to ensure that new hires strengthen their knowledge, skills, and abilities. Additionally, the checklist will be administered by the supervisors in the field to assess existing employee’s strengths and identify where training supports are needed. The information obtained through this process will inform the training topics that will be offered to existing employees.

Given recent priorities, all new hires have been engaged in SNAP training as a priority. After completion of New Employee Orientation staff attend SNAP training. The SNAP Workshop is designed to introduce New Eligibility Technicians to SNAP program policy and RIBridges. The workshop approach combines instructor-led portions, demonstrations, and hands-on exercises to provide a complete integrated policy and system learning experience. After this training, new ETs are prepared to process SNAP applications and recertifications, with final authorization of the case coming from their supervisor.

As CSDL strives to fully roll-out the comprehensive training plan for all DHS employees, they have collaborated with Deloitte to develop and implement a “Learning Lab on the Go”. This is a space created for Eligibility Technicians and their supervisors, that is set up in their field offices, where they can practice in RIBridges in a self-paced learning environment. The Learning Lab has prepared lessons that target expressed areas of focus with an emphasis of building capacity on RIBridges in the following areas:

1. Basic Navigation & Troubleshooting
2. Interim and Redetermination
3. Advanced Processing & Troubleshooting
4. Expedited SNAP processing
5. The importance of Case Notes
6. Captivate Programs Basic Navigation
7. Locating DHS-2/Self Service applications
8. Case Flow: Connections, Actions, and What Happens Next
9. Reinstate and Reopen
10. Case Change
11. Changing Head of Household
12. Reinstate Closed Case/Program
13. Removing Individual/Member from Case
14. Withdraw/Close Program/Case

Employee Engagement
CSDL is engaging RI DHS staff in the development of training. For example, Senior Eligibility Technicians, Call Center Managers, Supervising Eligibility Technicians, Eligibility Workers and Principal Clerks among others are part of a Training Advisory Board brought together to discuss trends and emerging learning opportunities. The Training Advisory Board comes together monthly, and membership is a yearly commitment. CSDL has also relaunched DHS “quarterly meetings”. During these meetings all staff are brought together for critical updates, training on new policies and are provided with the opportunity to give feedback to DHS leadership. By engaging staff members in the process of training program development, staff will feel heard and validated regarding their training needs.

Supervisor Training Program
With assistance from the Center for Human Services (CHS), at the University of Rhode Island (URI), CSDL has developed a Supervisor Professional Development Program. The program has four modules totaling 21 hours of training in phase one, and another 12 additional hours in phase two. The training topics include guiding the work, organizing the work, managing relations, and communications. Each module builds capacity by strengthening supervisory competencies, such as: interpersonal savvy, building effective teams, accountability, and results-driven outcomes. Topics covered also include effective leadership style and delivering extraordinary customer service. CSDL is currently working with CHS to build out each module and expect to roll out the program in September 2018.

Interagency Training Workgroup
CSDL is leading an interagency workgroup to develop an end-to-end training curriculum with representatives from EOHHS, HSRI, and Department of Children, Youth and Families (DCYF). The purpose is to identify “touchpoints” where customers interact with sister agencies as well as DHS. This will enable us to develop a “warm transfer” concept and deliver extraordinary customer service. The group has a shared vision and has developed common goals and objectives. Meetings occur on a bi-monthly basis.

The enhancement of DHS’ training program is critical to successfully transition employees and improve operations of the agency’s programs. DHS’ training team has developed a new hire onboarding strategy that requires all new employees to attend a two-day orientation and continue into one of the nine program tracks. The All Programs Track will serve as the foundation for most of the positions which will build knowledge, skills, and abilities for both new and existing employees.
1.3 Career Path Creation

We believe that in order to take advantage of our IES system, we will need to improve the career path for ETs to ensure we have both a specialist workforce that can process individual programs, and a generalist workforce that can work across programs or in different channels of services. As such, RI DHS has worked with our union partners to propose changes to the current Eligibility Technician Hierarchy in the current Local 94 contract for Eligibility positions. These proposed changes align the skills and competencies needed to comply with both accuracy and timeliness standards for administering public assistance programs. In addition, these changes also align with the replacement of the legacy system which increases the need for enhanced computer skills and alters the approach from a specialist to a generalist approach where employees need to demonstrate the knowledge and skills of many public assistance programs. RI DHS is proposing changes to each specific classification as described below to create an employee learning and career pathway from entry level eligibility positions to eligibility specialists that incorporates education, experience and on-the-job performance reviews. This revised classification hierarchy will ensure staff receive the basic foundational skills with clear and direct learning opportunities that support growth and encourage staff to remain in positions where their skills and expertise will enhance service delivery outcomes.

RI DHS is actively working with its counterparts at Human Resources through the DOA and Local 94 Union Officials to move the proposed changes through the Public Hearing process. We are structuring the changes on the grounds as much as possible and have union support through Special Purpose Agreements to implement parts of the plan below while the process is under formal promulgation.

The proposed career ladder will include the following positions (pending approval):

| ELIGIBILITY TECHNICIAN I (ET1) | Title/Content Change to existing Eligibility Technician | DHS has updated the current job descriptions to ensure staff receive 18 months of training and on-boarding to increase proficiency in program knowledge. This job classification has been updated to include the advanced technical skills required including a name change from Eligibility Technician to ET1. |
| ELIGIBILITY TECHNICIAN II (ET2) | New Position for DHS-Lobbies & Call Center | RI DHS is creating this new classification to make the distinction between non-lobby processing of applications and customer facing interactions through working the lobbies in field offices as well as working inbound calls in the Call Center. Eligibility staff must demonstrate excellent customer service skills and show a steady progression throughout the hierarchal levels. |
| ELIGIBILITY TECHNICIAN III (ET3) | Change in title & content to existing Senior Eligibility Technician | RI DHS is creating this new ET classification, ET3 to replace the existing classification of Senior Eligibility Technician as we have significantly revised the role and responsibility of the existing |
classification. RI DHS is proposing ET3’s have a minimum of forty-eight (48) months of employment as an ET1 or ET2 or cumulative experience combined from both roles prior to application for an ET3. RI DHS ET3’s will be dispatched to work special projects as operational needs warrant attention. Employees will need to have advanced technological skills in navigating through the integrated eligibility system, troubleshooting problem cases, identifying solutions and escalating and monitoring through the appropriate channels until resolution of customer issue.

Eligibility Specialist (DHS) – New Classification

DHS is creating this new classification, Eligibility Specialist to support and bridge the gap between Eligibility staff, Supervisors and DHS Leadership. DHS is proposing Eligibility Specialists have a minimum of sixty (60) months of employment as an ET1, RI DHS ET2 or ET3 prior to application for an Eligibility Specialist.

II. Process Improvements

RI DHS is committed to evaluating and improving business processes as part of our commitment to continuous improvement of our customer’s experience. A full “end to end” review of departmental processes is underway.

2.1 Business Process Redesign- First, RI DHS has contracted with Public Consulting Group (PCG) to support the Department’s business process redesign efforts with a critical focus on lobby management practices. This engagement kicked off in April 2018 and includes the following key objectives:

- **Review local office operations** – PCG will spend multiple days at each of the Regional Family Centers and the RI DHS Call Center. In order to understand the day-to-day work of SNAP, they will conduct staff focus groups, meet with office managers, conduct over-the-shoulder observations with eligibility staff, and speak with clients about their experience and help to define the customer experience and journey through office.
- **Review central supports, organization structures, training materials, monitoring and data capabilities, workload management processes**
- **Evaluate CCRU and QC functioning** and how they intersect with the eligibility and administrative structure.
- **Complete current state assessment** – PCG will document, process and analyze observations including:
▪ **Mapping and analyze key business processes** – to clearly articulate how processes are completed today, including where bottlenecks and delays occur.

▪ **Completing Customer Journey mapping** – to document the customer perspective throughout the eligibility experience and determine opportunities for improvement.

▪ **Analyzing key performance measures and operations data** – to establish key findings about performance patterns, interconnected measures (e.g. delayed application processing = increased phone calls), and gaps in reporting capabilities.

▪ **Analyzing leading national practices and lessons learned** – to describe best practices from other jurisdictions that are particularly applicable to the context in Rhode Island.

▪ **Design Operating Model** – PCG will collaborate with RI DHS to draft a blueprint for a new model. This will include:
  ▪ Guiding principles of the new model
  ▪ Descriptions and diagrams of new/improved business processes
  ▪ A description of management and supervision responsibilities
  ▪ A plan for improving office design and lobby management
  ▪ A process for workload management and determining staffing levels for various tasks
  ▪ A strategy to incentivize preferred channels and improve the Customer Journey
  ▪ A list of key performance indicators and how they will be used in day-to-day operations
  ▪ A new system for Quality Control and improving SNAP compliance
  ▪ A new system for managing performance, both at the system level and staff level

▪ **Develop Performance Improvement Plan (PIP)** – Developing a PIP, which will include short, intermediate, and long-term recommendations.

▪ **Develop Implementation Plan** – In tandem with the PIP, PCG will develop an implementation plan with tasks, schedules, and milestones. Recommendations to include change management, including those related to readiness, training, communication, and governance.

▪ **Conduct pilot implementations (Rapid Cycle Testing)** – PCG will support the implementation of several new facets of the new operating model. For any pilot implementations, PCG will support the activities in collaboration with a small pilot implementation team comprised of RI DHS staff.
  ▪ Select pilot office(s) and conduct kick off meetings
  ▪ Establish goals and success indicators for measuring
  ▪ Develop training materials and procedures to concretize processes
  ▪ Acquire and utilize additional employee training aids and signage
  ▪ Provide formalized training (e.g. classroom, lab, webinar)
  ▪ Launch and provide on-site support, including over-the-shoulder training
  ▪ Monitor progress, collect feedback, refine processes and provide additional support
  ▪ PCG will coach RI DHS staff members at all levels in continuous improvement principles and tools.

▪ **Conduct additional skills training** – PCG will identify fundamental skill gaps that make it difficult to realize a high-performing operation. Ad-hoc training for management and/or front-line staff, may include topics such as supervision and coaching skills, customer service, systems training, or policy.
Where appropriate, staff will be cross-trained in Eligibility, Fraud, CCRU and QC functions to promote comprehensive understanding of SNAP functions and intersections.

- **Implement new performance management system** – Reports and communication tools will accompany new processes. Management, supervisor and staff will learn to identify and use performance metrics. PCG will assist the state in developing regular performance management meetings, both at the state, office, team/unit, and individual level.

- **Facilitate Workshop 4 with Project Leadership Team** – This workshop will focus on reviewing progress to date and celebrating early successes. This may also be an opportunity to make major strategic decisions; redefine priorities; and improve implementation.

- **Assess impact and adoption rates** – As RI DHS implements multiple components of the new operating model, PCG will help to monitor the adoption of new processes, fidelity to standard operating procedures, and whether the new model is creating the desired effect. In order to do this, PCG will lead the following activities:
  - **Collect and troubleshoot issues** – PCG will periodically perform routine and random site visits to understand (and track) what problems local offices are running into.
  - **Perform staff focus groups/summits** – PCG will conduct a series of focus groups or summits with eligibility staff to collaborate on ways to improve the system.
  - **Analyze performance data** – PCG will intensely review reports and performance measures to help ensure that changes are on track.

- **Provide change management support** – As implementation enters full swing, PCG will provide ad hoc technical assistance, trainings, and facilitated continuous improvement meetings. PCG will work closely with RI DHS to ensure changes “stick” throughout the organization in a meaningful, sustainable way.

### 2.2 Lobby Upgrades

In addition to the PCG engagement, an interdepartmental taskforce was formed in November 2017 that includes staff from the Governor’s Office, Division of Capital Assets Management and Maintenance (DCAMM), DOIT and RI DHS. This taskforce walked through and observed the six (6) primary DHS offices. RI DHS supervisors and key internal stakeholders were surveyed to identify obstacles and processes for improvements. Because of these efforts, the Providence, Warwick and Woonsocket offices removed unneeded furniture from their lobbies, allowing the queues to be redirected; customers now enter faster and move through lines quicker. A second lobby was opened in Providence. The lobby is staffed with customer service aides and eligibility technicians capable of addressing all SNAP related business. The Providence office opens the lobbies at 8:00am to greet customers and identify needs a half hour before standard operating hours. The two largest volume offices, Pawtucket and Providence, added eligibility staff to the front desk. Currently underway, both Wakefield and Warwick are reconstructing front desks to add additional customer service windows. Woonsocket is relocating its greeter station to reduce congestion when entering the office. Pawtucket and Providence are repositioning greeters and scanning and indexing stations to expedite customer service.

The task force recommended the installation of a queuing system. DHS leadership evaluated pros and cons of the system utilized by the Rhode Island Department of Motor Vehicles. RIDHS is obtaining quotes for installation and maintenance of a queuing system.
2.3 Worker Inbox Impact

In FNS’s November 8, 2016 advanced notification letter, FNS cited the need to “develop and implement a triage and work prioritization plan to tackle expedited cases, pending applications, and recertifications.” The State has made significant progress in this area to date as has been detailed in other portions of this corrective action plan. While no one technological fix exists to improve the State’s comprehensive operational performance, the introduction of a new Worker Inbox (WIB) represents a significant technological improvement that the State believes will continue to enhance the efficiency of SNAP case processing.

The WIB was re-designed in late 2017 and early 2018 to meet core business requirements that have been codified with the DDI vendor in the functional design document. Above all, the worker inbox was re-designed to be:

- Configurable: It should support task or case based processing, workers can be assigned specific work according to management priority and overall workload, and supervisors can track work that has been assigned, completed or not yet assigned.
- Actionable: Work can be searched, filtered, and selected based on a set of appropriate criteria, and presented in an organized manner, driven by the type of work required to complete a case; data from the worker inbox should be available to management to drive work assignments and allocate resources.
- Fast: Workers will see every task associated with a case, use the tasks to navigate to the specific module to perform the action required on a case, and the technical performance of the inbox must allow for frequent, time-sensitive use.

The new worker inbox design meets these business requirements in the following ways:

1. Replaces previous worker inbox database tables with a new, custom database designed specifically for task management. This allows for greater customization of task types to enable better and more accurate configuration than could previously be accomplished. Further, it improves the speed and reliability of task retrieval. Put simply, when a worker gets a task, the database the worker is pulling from has been optimized for this use which should enable task retrieval in less than 5 seconds, instead of the previous 45 seconds.
2. Introduces a task configuration screen that allows supervisors to configure workers for specific tasks, based on current workload, and the individual workers skills and training. The previous inbox often had tasks showing up in the wrong “queue.” The new design should all but eliminate these issues based on task configuration supported by the new database structure.
3. Improves tasks assignment methodology to one of three ways: direct supervisor assignment, worker search, and the “Get Task” button. The “Get Task” button is based on due date of the task in the system to ensure that those cases most in need of attention are worked first.
4. Streamlines the worker and supervisor dashboard to show the work that exists in the system that is assigned to a worker and its status by age so that workers and supervisors can more easily take ownership of the work to be performed.
5. Improves the generation of tasks to ensure that tasks are generated only when there is work to be performed, and that the name of the task indicates to the worker what must be done, and the task itself takes the worker to the page in the worker portal that requires action. For SNAP, this means that the task will differentiate for a worker when a case is at the beginning.
of the process awaiting intake versus when the case requires an interview or when the case requires verification of additional information provided.

This is not the first time RI DHS has tried to re-design and implemented an improved worker inbox. As stated in the Corrective Action Plan update of December 12, 2017, we anticipated an improved worker inbox well before this May. The DDI vendor discovered that existing technology in 2017 could not meet the business requirements stated above. To meet the objectives of configurable, actionable and fast, the DDI vendor brought in a separate team, distinct from the previous one, and separate coders, a recommendation of our IV&V vendor. These individuals ran a re-design process with broader input from the State, including from RI DHS workers and supervisors. We believe based on these new additions to the vendor team, and with strong input from workers and supervisors, we have arrived at a better design.

The State expects the following improvements based on full implementation of the worker inbox:

- Improved efficiency from the retirement of paper lists, to come from better data tracking and KPI measurement, task prioritization and ease of navigation for workers.
- Reduced variation in processing based on slower assignment of paper lists and better tracking of daily worker performed.
- Increased ability to “work the whole case,” including case changes and other alerts which are more cumbersome to work on a list.
- Improved timeliness from organizing work more specifically across lists and automatically highlighting cases that are about to become overdue through the worker and supervisor dashboard.
- Improved management visibility in to task assignment and staffing needs; work assigned and work performed currently must be tracked by hand. More worker inbox functionality and data will reduce the burden on supervisors and provide ready-to-analyze information. The PCG PBR work should help us incorporate this data in to everyday business processes.

### 2.4 Clerical Improvements

RI DHS and Deloitte partnered to evaluate how front-end services impact SNAP timeliness. Five impediments to timeliness were identified; Applications Registration conducted too late for SNAP Eligibility and Expedited Service to be processed timely, Appointments Scheduled too late for SNAP Eligibility and Expedited Service to be processed timely, DHS-2/Supporting Documents Missing or not available at time of eligibility interview, Documents sent to Central Scanning cause processing delay and Outstanding Defects that impact application and case processing, delaying timely actions.

Extraordinary customer service and same day service are two operational goals RI DHS strives to achieve daily. The DHS – Deloitte Joint work group identified a path and timeline to remove impediments and move closer to our goal. Front office improvements will enable staff to register or associate applications, scan documents and schedule appointments on day of application. Thirteen (13) new scanners will be installed in June. Scanned documents are auto indexed using a cover sheet containing customer’s metadata QR code and Smart Separators by document type. Each office will complete these activities on-site. Time is saved during auto indexing. Additional time is saved by completing all tasks on-site. This combines to reduce opportunity for error and allow the greatest number of days for processing. Customer can receive service and move through office faster.

- **June 2018- Application Registration Improvements:**
  - MCI case matching logic enhanced to display only true matches
14-point cleanup of MCI which removes all duplicate cases
- Application Registration to be used for only new applicants
- Case association will be used for known customers applying for new program
- Added a stand-alone Expedited Screen for existing cases
- Reconfigured Calendar set-up for individual offices
- Enabled “print appointment” for appointments scheduled within three (3) days
- Fully leveraged appointment tracking logic in RI Bridges

June 2018 - Scanning and Indexing Improvements:
- Offices have increased the number of scanners and customer service aides
- Scanning will occur on-site in program offices
- All offices and central scanning will have capacity for Auto-Indexing
- Auto Indexing uses Document Cover Sheet that is stamped electronically with metadata for tracking
- Cover sheet has date/time stamp, key client information; becomes customer receipt
- Documents are available in record within 15 minutes
- Hard copy of documents submitted in person are immediately returned to customers for their records

2.5 Governance

The State considers governance in two parts: programmatic and IT. New IT governance remains in place since April 2017. As part of the FNS on-site visit on April 12, 2018, we reviewed revised organizational charts for the UHIP project, as well as improvements made in IT governance over the last three months. These improvements include but are not limited to:

- Shifting from a project team approach to a theme approach. Teams are now organized around themes and are working to deliver the critical business capabilities required to remove benefit blockers and achieve compliance. This has brought a greater focus on defect management than the previous project runway, which was designed to improve basic functionality in the worker portal and deliver deferred functionality such as restaurant meals for SNAP
- Improving management of risks and issues in the IRC to ensure that agreement is reached prior to closing project risks and issues, and that mitigation strategies are documented in JIRA.
- Changing the Maintenance Prioritization Committee into one, unified prioritization committee, combining problems tickets and BRRs, inclusive of BRRs, problem and data fixes. Gates at MPC are used to assess priorities brought forward by the theme teams and to develop release plans which are brought to the executive committee for decisions regarding scope and timing. CRB continues to be used to approve hours.
- Clarifying roles and responsibilities of business analysts and project managers. State BA(s) and PM(s) are being directed to engage more actively throughout the SDLC including more proactive planning, escalation of risks / issues and more involvement in the SIT, UAT and business readiness activities.
- Re-starting executive status reporting as a single source of truth to promote transparency into governance, tracking and key metrics.

Programmatic governance exists within each of the agencies and with overall coordination and shared services provided by the Executive Office of Health and Human Services through our statutory responsibility. In 2017, KPMG provided consulting support to help the State develop an improved program governance model.
While the State believes that it must continue to improve its programmatic governance maturity over the life of the project, the State has moved immediately to implement many of the governance bodies recommended by KPMG. The table below summarizes the governance bodies recommended by KPMG, and how the State has implemented them in the last 6 months.

<table>
<thead>
<tr>
<th>KPMG Recommendation</th>
<th>State Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Governance Board</td>
<td>UHIP Executive Committee governs the project for both IT and program changes, and consists of all agency directors, IT leadership and EOHHS shared services leads.</td>
</tr>
<tr>
<td>Finance &amp; Resource Oversight</td>
<td>UHIP Finance Committee fills the role of overseeing financial management for UHIP, sets standards and establishes principles.</td>
</tr>
<tr>
<td>Operational Coordination and Communication</td>
<td>Interagency Operations Committee reviews interagency processes and keeps coordination. This committee also looks across agencies to identify common needs and pain points, and develop solutions, either operational, programmatic or technical.</td>
</tr>
<tr>
<td>Project Committee</td>
<td>Project committees are launched on an as needed basis, with the most recent example being on LTSS backlog mitigation.</td>
</tr>
</tbody>
</table>

2.6 Command Center

Command Center 2.0 – Executive Overview

Identifying, Triaging, and Resolving Blockers and System Issues

Beginning in February 2018, the State and Deloitte launched Command Center 2.0 with two goals: 1) ensure that any cases blocked from receiving benefits due to a system issue, and other priority tickets
affecting benefit accuracy or amounts, were being tracked, and 2) significantly reduce the number of cases being blocked as part of stabilization efforts. To meet these goals, Deloitte set up a physical command center in their office, established new processes and metrics to track tickets, deployed new tools to identify priority tickets for triage more proactively, and codified procedures with DHS Tier 2 to ensure that blocked cases were appropriately tagged and routed to the Command Center.

While these efforts continue, the initial results have been successful. At the beginning of February, the State had 1788 cases blocking benefits due to a system defect. By the end of March, we had 330 of such cases. This approach has been particularly helpful as we continue to improve SNAP timeliness rates. The State is constantly mining various channels to ensure we are capturing all blocked cases, including talking to staff, looking at MMIS, and soliciting feedback from providers. We are pleased this approach had begun to provide benefits to Rhode Islanders, and is reducing frustration among staff in the field.

We continue to report command center metrics weekly in the Deloitte Executive Status deck provided to FNS staff beginning in late April. State and Deloitte leadership review these metrics weekly as part of standing governance meetings.

2.7 Backlogs

RIDHS has made significant improvements in the timeliness of application processing and has eliminated or reduced many of the backlogs that had built up immediately after go-live. Currently, RI DHS has no SNAP request for benefits backlog. In general, all workers have been trained to work “full cases” as they pick up any task for a SNAP cases. For example, if a RI DHS ET is working a current recertification and encounters an unworked change document for a case, they will work the unworked change document while also working the recertification. Any updates to eligibility will be completed and retroactive changes to benefits will be made if required. The following backlogs remain to be worked but RI DHS has a plan and target dates for all of them (note, these targets are contingent upon the execution of the staff augmentation contract currently pending FNS approval):

<table>
<thead>
<tr>
<th>Current pending tasks</th>
<th>Target completion date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recertifications</td>
<td>10,881</td>
</tr>
<tr>
<td>Verifications and Changes</td>
<td>32,112</td>
</tr>
<tr>
<td>Interims</td>
<td>8,985</td>
</tr>
</tbody>
</table>

III. Technology Improvements

3.1 Completed SNAP work

Since the RI Bridges system went live in September 2016, DHS and Deloitte have implemented 30 releases to stabilize the system, enhance its design, fix defects, and significantly improve the timeliness of SNAP benefits. Some highlights include:

- We have added new functionality to streamline and expedite application processing, reduce the backlog of overdue SNAP applications, and increase the accuracy of eligibility determinations and payments.
Due to a focused effort on consistent and stable system operations, the number of new and existing incidents (when the system does not operate as expected) has been declining steadily. Open incidents have declined 73% since December 2017.

As previously mentioned, SNAP application timeliness also continues to improve. In April 2018, SNAP benefits were issued timely to nearly 90,000 households and 90% of new SNAP applications were processed timely – a nearly 10% increase over the previous month. The number of applications not processed timely continues to represent less than 1% of the SNAP population receiving benefits.

The number of SNAP cases worked per worker, per day, has doubled and overdue applications that can be worked by a DHS worker have been reduced from 780 to just 13.

System productivity is also increasing. Eligibility checks have tripled since RI Bridges launched.

We have also made important system enhancements to improve the user experience for both workers and RI residents.

For workers, we have:

- made it easier to process multiple verifications for a single case
- eliminated the need to run eligibility just to update addresses and e-mails
- trimmed the number of data fields and simplified reporting logic to a direct question, reducing the potential for mistakes that can impact benefits
- added in-line validations to make it easier to correct and update information during case processing
- enhanced the MCI clearance process to use all criteria, not just SSNs, to accurately match individuals with cases
- eliminated the need to fully process a case before withdrawing the application for interview no-shows
- enabled them to add a program to an existing case, without completing a full application registration
- made operational improvements in field offices that are reducing the application backlog

For RI residents, we have:

- made it possible to submit a SNAP application in the Customer Portal without having to answer questions about other programs
- limited the questions they see and answer to those that are SNAP-related
- aligned the expedited screening processes in the customer and worker portals to ensure that expedited tasks are properly generated from the customer portal

Attachment A (RI UHIP SNAP Release Summary_5.3.18) summarizes these releases and scope breakdown, while the JIRA extract embedded in the slide contains the itemized list of changes (BRRs) and defects (Problems) by release.

3.2 Schedule for SNAP improvements

DHS and Deloitte have thoroughly reviewed the current system’s functionality and agreed on what still needs to be done to meet SNAP program compliance. Our review incorporated the 2015 FNS checklist: “Review Tool State PAR - Application Checklist - 2015 FNS” and included an independent assessment by a
former caseworker from outside Rhode Island. We also held multiple workshops between Deloitte and SNAP program managers to gain the benefit of their insights.

This review identified about 20 additional changes (BRRs) and associated defects (Problems) across 8 themes. We then planned the desired sequencing of these items based on business need and critical event dates. The BRRs and Problems are maintained in our JIRA tracking system and itemized in the Attachment B “JIRA Extract SNAP FNS Focused Themes_20180308.xlsx”.

Additionally, the business capabilities and desired implementation sequence of these BRRs and Problem tickets is depicted in the Attachment C “RI UHIP Theme-centric Release Planning Outputs SNAP_v4.pptx”.

DHS and Deloitte have collaborated to determine the right release schedule and cadence to continue the progress we have made in driving quality and improving our delivery capabilities. We agree it is best to re-evaluate the releases we had planned for May, June and July 2018 and to re-examine the release schedule for the remainder of State fiscal year 2019. Over the next several weeks, DHS and Deloitte will align the sequenced BRRs and Problem tickets with the release schedule to develop a full release plan with the scope needed to fully comply with SNAP program requirements. This full release plan will be provided to FNS upon finalization.

As RIBridges is an integrated system, this exercise requires the State of Rhode Island and Deloitte to take a holistic view across all programs to be able to accurately align the SNAP items to specific dates in the release plan.

IV. Answers to specific issues raised in the 4/16/18 FNS letter

Certification

4.1 Failure to close thousands of cases because of unprocessed recertifications and periodic reports

In an effort to reduce disruption of benefits to vulnerable Rhode Islanders, during the initial phase of system stabilization, RI DHS did not close cases with recertification or interim packets pending even if they had not been worked. The Department shifted back to FNS policy beginning in November 2018 and has closed cases for which no recertification packet or interim report was returned by the household. This practice continues and any case, on which no recertification packet is recorded as being received by the agency, is closed at the end of the household’s certification period. Similarly, if no interim report is received by the end of the 6th month of the certification period, the case is closed.

Additionally, as of October 1, 2017, any case, for which a recertification packet has been returned by the end of the certification period but DHS is unable to complete the processing of that recertification by the end of the certification period, will not be issued benefits until the processing of that recertification is complete and the household is determined to be eligible for continued participation. The state’s goal is to complete the processing of all recertifications according to . Any recertifications received after the 15th day of the last month of the certification period but before the last day of the certification period are processed as they come in. Any recertifications that are received but not processed by the end of the certification are processed as priorities within the first week of the new month and benefits are issued back to the first day of the new certification period if the household retains its SNAP eligibility. Presently,
DHS can keep up with current recertifications and less than 300 recertifications roll into the first week of what would be the new certification period for processing.

As stated in section 2.7, there are approximately 10,000 recertifications that have been received since September 2016 but have not yet been processed. As RI DHS processes the current recertifications, it is also processing any other recertification found in the case. As such, from December 2017 to April 2018, the backlog of unprocessed recertifications has decreased by approximately 5,000 recertifications, which represents about a 33% decrease in five months.

4.2 Failure to Process Initial Applications Within Statutory Timelines

RI DHS has made significant improvements to application processing timeliness since the rollout of the new integrated eligibility system. In April, combined expedited and non-expedited SNAP timeliness reached 90%. While RI DHS’ goal is to achieve 96% timeliness for both types of applications, the department has greatly improved from last year’s timeliness rates which were as low as 50-60%. Having staff dedicated to this endeavor, along with the technological improvements we have made to facilitate processing over the last year, has enabled the department to keep up with the incoming applications each month; virtually no current applications are added to the backlog. The timeliness numbers continue to be affected the most by the processing of applications in the backlog.

RI DHS uses several manual tracking processes to improve its application timeliness rates. There are 20 eligibility technicians dedicated solely to processing SNAP applications. These two groups of 10 staff also track any application processing blocking system issues that come up during the processing of a SNAP application and ensure that the blocking issue is resolved so that the application can be processed within three days of the issue being identified. The work of these two teams of 10 eligibility staff is also supplemented by the work done by the state’s Tier II escalation unit, who researches cases impacted by system issues and helps ensure that resolutions to application processing issues are tracked and provided timely. Timeliness calls take place three times per week between the integrated eligibility system vendor and state staff to monitor the aging of applications. These calls are also supplemented by weekly executive meetings to review data, track system issues impacting application processing, and provide updates on timeliness for the week. The weekly meetings also include discussions on solutions to resolve any issues impacting application processing and timeliness. DHS has also taken full advantage of the Expedited Interview Waiver which allows DHS to postpone the interview for expedited SNAP applications if the household is otherwise eligible but cannot be reached for an interview through an initial cold call. This allows the state’s neediest clients, those eligible for expedited service, to receive assistance in a timelier manner.

The Department anticipates that the release of the new worker inbox will further help process initial applications within statutory timeframes by providing DHS will automated tracking metrics and better insight into the pending work. Among the features of the new worker inbox will be the ability to re-assign work, such as the processing of intake tasks, to additional staff as the need increases. This near-real time automated tracking of pending work will allow the Department to better staff and assign work so that it is completed within required timeframes.

4.3 Failure to process recertifications, periodic reports, and other case documents in a timely manner

RI DHS is committed to processing recertifications, interim reports, and other case documents in a timely manner. Anytime any eligibility technician is working on a case, it processes all pending documents on that case. As mentioned above, this approach has helped reduce the pending backlog of unprocessed recertifications significantly in the last five months. Additionally, RI DHS is in the midst of bringing on
contract staff to help process the backlog of pending case documents. The contract staff will help update cases with the changes reported in the interim and case change documents, while State eligibility staff will review and rerun eligibility on the cases.

At present, there are approximately 32,112 case documents, aside from recertification and interim reports, that need to be processed. DHS projects working through this backlog as reflected in section 2.7 with all backlogged case documents processed by October 31, 2018.

4.4 Failure to run electronic data matches likely resulting in over-issuance of benefits as well issuance of benefits to ineligible households

While all interfaces related to SNAP are in production, the Department still needs to act on some of the matches. In particular, eDRS was put into production on September 2017. Since that time, it is a real-time interface match that occurs at initial application as well as recertification. From September 2016 through September 2017, the state was utilizing manual processes by having the fraud unit staff check the eDRS system manually for new applicants. RI DHS has since run all recertifications since September 2016, against the interface, and is currently working on structuring an operational plan to address the matches. In the meantime, staff are instructed to work all tasks in a case, whenever a case is touched and eligibility is rerun. RI DHS is committed to implementing a full operational plan for working interface tasks after the June implementation of the worker inbox.

In January 2018, the DOA fraud unit as well as the system vendor performed a sweep of the system to identify any individuals who were found on the state’s Department of Health death match list but had an active SNAP case in the system. Those who were verified as deceased, were properly removed from SNAP. Similarly, the fraud unit performed data analytics on the active SNAP population as well the state’s prisoner system and identified individuals who were incarcerated while at the same time active on SNAP. Verification work is being conducted now to properly terminate SNAP participation for any incarcerated individuals and determine the appropriate action for those who were active on SNAP while incarcerated, who have since been released, and who are eligible for continued SNAP participation.

4.5 Improper case closures resulting from incorrect data conversion

DHS and Deloitte are committed to cleansing the data in RIBridges to improve accuracy of eligibility outcomes inclusive of closures, as well as other case actions. Since RI Bridges went live and 10 years of historical case data was converted from the legacy system, DHS and Deloitte have implemented several improvements that have resulted in cleaner case data for ongoing SNAP case management.

For example:

- We implemented several data fixes to update the tables that are used to interface with FIS, syncing RIBridges with the EBT vendor to successfully generate cards and issue payments.
- Accounts that were expunged from FIS were synced to RIBridges to deactivate the accounts and eliminate error messages when a SNAP client reapplies on the same case. We also updated the software to automatically deactivate expunged accounts going forward.
- We updated FIS look-up tables and payee information (primary/alternate) for all SNAP recipients and synced with the legacy system to avoid errors when integrating with FIS.
- We performed data clean-up on invalid EBT information for cases that were denied or terminated at the time of conversion.
- We cleaned up data to ensure more accurate eligibility determination and benefit issuance.
- Using data from the legacy system, we updated claim information to correctly reflect agency/client error and allow for a correct calculation of recoupment amounts and claim status.
- We fixed incorrect LIHEAP and heating/cooling information that was impacting individuals’ ability to receive standard utility allowance (SUA). We then ran a mass update on the impacted clients to accurately issue SUA benefits.
- We reviewed converted SSI & RSDI benefit information and corrected RSDI benefit types to more accurately determine disability flags for individuals.
- We updated and synced address and residency information across portals to more accurately communicate with SNAP recipients via mail.
- We made data integrity updates to avoid application and case processing errors on screen.
- We updated Master Client Index (MCI) information, along with clients’ SSN and alias information, so that HSRI and RI Bridges tables are in sync and there are fewer application errors when workers are processing changes on converted cases.

Additionally, as part of the FPL update done in the Fall of 2017, DHS reviewed the outcome of running eligibility on the approximate 85,000 SNAP converted cases to determine if any closures were accurate or needed further review by a worker. This was done by running the SNAP caseload through the RI Bridges eligibility engine in a test environment. Cases were then identified as: no change in benefits, changes to benefits, case closures, or cases pending worker action (e.g. a case change that needs processing). Converted cases that had no change in benefits, as well as those that had changes or closures, were later processed in the production environment. Converted cases that required further worker review before being processed in production were left unchanged; they are being reviewed by workers as each case comes up for renewal.

Lastly, and most recently, RI DHS, Deloitte and Northrup Grumman worked over several months, to review the dates associated with all cases within the caseload. Nine categories of recertification/interim status were identified (e.g. recertified within the last 9 months, within the 60-day certification window, within interim report window, etc.) and cases were identified as either simplified or change reporters. A review of all the dates related to each case was completed. The total caseload of 91,134 cases were reviewed. Of those 54,994 cases were identified as simplified reporters, with 49% of cases having a date changed within the system, of which 5,624 cases had their certification period end date altered. Of the 36,140 cases identified as change reporters, 34% required date alignment in the system, of which 5,233 cases had their certification period end date altered. In scenarios where the certification end date was changed, it was changed to comply with federal policy and align to their initial date of application or their last completed recertification, whichever was most recent. Recipients whose certification dates were aligned in that way were sent a notice to alert them to this change.

4.6 Inability to properly track and route applications, periodic reports, and other case documents to proper work queues.

The State of Rhode Island has been operating on a paper-list interim business process for new certifications, recertification’s and interim reports. While this interim business process is not ideal, the State has been able to achieve steady state processing through this method. The worker inbox will be implemented in June 2018 and will provide routing functionality for all SNAP related work.

4.7 Inability to pull accurate reports on the number of initial applications and recertification’s received and processed to a decision
RI DHS has worked closely with its integrated eligibility system vendor to improve reporting capabilities of the system, so that the State can receive and maintain, among other data, accurate records of applications and recertification’s received and processed. At present, RI DHS provides FNS with a weekly report, which includes the number of initial applications received and processed during the week, as well as the number of recertification’s received and processed each month. While the current work is being tracked manually through data pulls from the system, the new worker inbox will allow this type of information to be available in near-real time and at a worker level, allowing the work to be assigned and reassigned as the need to process tasks shifts during the month. Supervisors and administrative staff will have the capacity to monitor the volume and type of tasks coming into the department. Utilizing the worker inbox functionality, the workforce assignments will be adjusted to match the demand. Dashboards, updated daily, are currently available on the State’s Tableau Server and are used for workload management.

4.8 ABAWD functionality remains inadequate

The ABAWD functionality was implemented into the integrated eligibility system in August 2017. Since its implementation, the functionality has been the focus of many system releases, with handful of defects being addressed in each system release since January 2018. Currently, all system defects and enhancements related to ABAWD functionality are scheduled to be addressed this summer. At that time, it is expected that the functionality would be correctly identifying all individuals as ABAWDs subject to the three-month time limit as well as those who are exempt from the time limit due to meeting the ABAWD work requirement, receiving the 15% exemption, or living in an area waived from the time-limit requirement. The system should also correctly identify those SNAP individuals who are not classified as ABAWDs due to an exclusion, and properly identify which exclusion makes the individual a non-ABAWD. The system is also expected to correctly identify any countable months for each ABAWD individual within the state’s fixed three-year clock. Information on ABAWD status, including the number of countable months, must be maintained on a monthly basis. The comprehensive report used to track ABAWDs is slated for generation in August, after the functionality defects have been addressed and the ABAWD reference table has been updated in the system to reflect that on September 1, 2018, there will be 13 communities subject to the ABAWD time-limit, compared to the 1 community subject now due to the state’s change in ABAWD waiver status in September 1, 2017.

In addition to system functionality fixes and enhancement, RI DHS is also working on a comprehensive communication plan, staff training curriculum, and case management plan on ABAWDs. This includes updates to the notices being used to inform ABAWDs of program rights and responsibilities, reporting requirements, status, and countable months. The state is also working on restructuring its workforce activities, such as Employment and Training, workfare, and other employment and training opportunities statewide, to best serve the ABAWD population.

4.9 Persistent issues with functionality related to the SUA, resulting in inaccurate benefit issuances to thousands of households.

At present only one known system issue related to the Standard Utility Allowance (SUA) remains. RI DHS has found that approximately 150 cases have had the heat and eat issuance, but no corresponding SUA. This issue is being tracked by ticket RIB-58029 and a fix is scheduled for this summer. All other issues identified with the SUA have since been resolved.

While this business process has succeeded in ensuring the vast majority of SNAP beneficiaries receive their benefits in a timely manner and in accordance with FNS APT guidance, the worker inbox as described above will be critical to ensuring that all tasks are routed to the appropriate worker. The
worker inbox will also allow for improved processing of change reports, and other associated interface alerts for the SNAP program.

Issuance

5.1 Duplicate Accounts established with duplicate payments made either electronically or manually through the EBT administrative terminal and lack of controls in place to prevent duplicate issuances

As indicated in the Corrective Action Response (CAR) submitted to FNS on May 1, 2018 as a response to the findings resulting from the FFY2017 Electronic Benefits Transfer (EBT) review, RI DHS must establish account creation processes to ensure it is in compliance with 7 CFR 274.6(b)(1). The lack of efficient system controls to prevent duplicate account creation is a state-wide concern affecting the entire SNAP caseload. RI DHS is working with its integrated eligibility system vendor to improve the Master Client Index (MCI) clearance functions and application registration procedures to avoid creation of duplicate individuals and cases. Additionally, RI DHS is working with the EBT vendor to do a sweep of the EBT system to locate and deactivate any duplicate accounts as well as put mechanisms in place that will alert the state agency when the eligibility system is sending over potential duplicate accounts to the EBT system.

Upgrades to the MCI clearance logic and application registration process to avoid creation of duplicate individuals and duplicate applications/cases were implemented in the system with the April 21, 2018 release with RIB-64236. The improvements make it more difficult for a duplicate account to be created, when the individual already exists in another case in the system. RI DHS is also continuing its data merge and data integrity work, by which all individuals active in more than one SNAP case are identified and the duplicate case is disposed.

RI DHS is also working with the EBT vendor to provide a list of accounts that match on name, social security number and date of birth, so that RI DHS can review and determine if duplicate accounts exist. RI DHS will deactivate any duplicate account and ensure that any active account is associated to the proper case in the eligibility system. Additionally, the EBT vendor will put into place a reporting mechanism that will check each file sent by the eligibility system to the EBT system for any duplicate accounts as well as any accounts that have incomplete social security information and provide such report to DHS who, in turn, will analyze the data and deactivate any duplicate account. Additionally, RI DHS will analyze the cause of the missing and/or incomplete social security information to ensure correct data points are being exchanged in the file to prevent duplicate accounts from being set up in the EBT system. The EBT vendor is to provide a list of duplicate accounts by the end of the first full week of May 2018. Based on the information received from the EBT vendor, DHS expects to deactivate any duplicate accounts by end of August 2018. RIB-76572 is tracking the work needed to be done in the system to ensure EBT account information is tracked and maintained at the individual level, so that creation of duplicate EBT accounts is minimized.

5.2 Benefit issuances and reconciliation activities are not properly conducted or accurately reported

As indicated in the RI FFY2017 EBT CAR, DHS aims to be in compliance with the reconciliation procedures required under federal regulations by the end of September 2018. RI DHS is working with its integrated eligibility system vendor to establish reconciliation reports that can be utilized by the department’s financial management staff to ensure only certified eligible households receive benefits and that those benefits are distributed timely in the correct amount. RIB-58718 (SNAP Payroll Transmission Reconciliation Report); RIB-58714 (Food Stamp Monthly Payroll); RIB-58705 (SNAP EBT Monthly Summary) are the three tickets tracking the reports that need to be produced by the eligibility system in
order for the state to conduct the necessary reconciliation activities. These reports are scheduled for the July 7, 2018 system release.

RI DHS is also working with its EBT system vendor to ensure the EBT system is providing RI DHS with the appropriate reports on all SNAP issuances, cancellations, etc. DHS is targeting September 2018 to be the first month all reconciliation activities begin as regular processes and intends to provide FNS with copies of the reconciliations reports and activities to ensure compliance.

5.3 Open defect tickets indicate SNAP benefits were issued prior to application date

There is not an open system defect where SNAP benefits are issued prior to the application data. As part of the Data Integrity work being done by the state and the system vendor, there were approximately 53 cases identified as appearing to have SNAP issuances before the case’s application date. Upon further analysis, it was determined that the cases were reinstated or reapplied cases, and the issuances being displayed were from the prior and/or original application date. Work is currently underway to adjust the program request date to the correct date so that there is no mismatch of data in the system. Presently, no over-issuances have been identified as part of the cases reviewed. Work is being tracked by RIB-58193, and the data ticket is RIB-45837. Once all impacted cases have been reviewed and dates adjusted appropriately, these tickets will be closed.

5.4 Open defect tickets indicate SNAP benefits were issued in excess of the maximum household allotment

There is not an open system defect where SNAP benefits are issued in excess of the maximum household allotment. As part of the Data Integrity work being done by the state and the system vendor, there were cases identified that appeared to have SNAP issuances above the maximum allotment for the household size. Upon further analysis, it was determined that this issue affected approximately 50 cases where the new FFY18 thresholds were not applied. The FFY18 maximum SNAP allotments decreased from the prior year. As such, the cases that were not updated with the new thresholds, had benefits above the maximum household allotment. As part of RIB-46778, the affected cases were updated with the correct SNAP allotment thresholds. RIB-58175 was the ticket tracking this data integrity issue and since no code fix is required, the ticket has been recommended for closure.

5.5 The State Agency is unable to demonstrate security and control procedures for EBT Cards and system access

As indicated in the CAR submitted to FNS on May 1, 2018 as a response to the findings resulting from the FFY2017 EBT review, EBT cards returned to the SA’s central scanning center were not maintained in secure storage as required by 7 CFR 274.5(c)(1)(i). This deficiency affected those EBT Cards which were returned to DHS by mail as undeliverable. The cards were not separately stored under lock and key. Additionally, DHS lacked written guidance on the procedures for staff to follow when EBT cards were returned to the Central Scanning Center as undeliverable mail. Staff were not fully trained on the procedures necessary to comply with federal regulations related to secure EBT card storage. To address these deficiencies, DHS has created the security policy for returned EBT cards for the scanning center and all staff at the scanning center have been trained on the new procedures. As of April 1, 2018, any EBT cards returned to the Central Scanning Center are stored separately under lock and key in a supervisor’s desk. A copy of the new procedures has been provided to FNS with the RI FFY2017 EBT CAR.

Additionally, DHS Transmittal 15-09 enumerates the agency’s EBT Security Procedures, including those for bulk inventory control records as well as periodic review and validation of inventory controls and records by parties not otherwise involved in maintaining control records. The Transmittal has been refined and an
updated Transmittal 15-09 will be shared with all DHS staff by May 31, 2018. A copy of the updated transmittal was provided to FNS with the RI FFY2017 EBT CAR.

The EBT Coordinator maintains and will continue to maintain bulk inventory control records. Each time the central office issues EBT cards to the field offices, a log is updated, signed and managed. The EBT Coordinator also conducts and will continue to conduct periodic reviews of inventory control at all six DHS field offices. Each time an EBT Card is printed at a DHS field office, staff maintains a record of that card issuance and keeps a running tally of all cards printed by that location for each day. Inventory records are checked daily by the supervisor overseeing the work of RI DHS staff engaged in the work of printing EBT cards. Inventory records are sent to the EBT Coordinator monthly so that reconciliation can be conducted against the bulk inventory records. The EBT coordinator also schedules periodic visits to the RI DHS field offices to validate that the security procedures are being adhered to by the appropriate field staff and the field office management.

RI DHS stores all unissued EBT cards and PINs, and unused spare POS devices under lock and key while not in use. At the central office, the EBT cards have been under lock and key in a secured closet, with access allowed only to the EBT Coordinator and, in her absence, the Managerial Evaluator. Since moving the EBT Coordinator to the Providence field office in December 2017, the EBT cards have continued to be in a locked storage location with key access limited to known and authorized individuals. At present, RI DHS has no unused spare POS equipment.

**Quality Control**

**6.1 The State has a backlog of QC reviews and missed the deadline to submit active cases for FFY2017**

As of the end of April 2018, there were still 250 active cases from FFY17 needing QC review. DHS QC reviewers are working to complete these last reviews and under current staffing levels and pace of work, FFY17 reviews should be done by July 2018. The reviewers are working overtime and on weekends to complete these reviews. At the same time, work has also started on FFY18 negative cases reviews.

The department’s goal is to complete all FY18 reviews by the end of December 2018, so that FFY19 work can be started under a steady staffing state and on time.

To meet the target completion date of December 31, 2018, the QC Unit needs to establish efficient processing procedures, leverage the tools available in RI Bridges and determine staffing needs. DHS is working in partnership with Deloitte and PCG to analyze these three areas. The goal is to reduce the average time to complete and document a QC review to 2 hours. The Department is prepared to staff, train and supervise staff to this goal. If required, the Department may seek FNS approval to use one of the State’s contracted auditing resources to provide additional staff to support the backlog of QC work. The need for this will be evaluated by June 30, 2018.

System functionality defects related to QC have been flagged as priority issues for upcoming system releases.


**Reporting**

### 7.1 The State has failed to submit required reports in the Food Programs Reporting System

The State continues to work with their Information Management counterparts at Deloitte to develop and revise required reports. The Information Management team meets on a weekly basis to prioritize the release of reports and discuss issues, risks, and changes for specific reports or database scripts.

Releases for reports are typically scheduled on a bi-weekly basis, but efforts are made to provide reports outside of scheduled releases to ensure more timely delivery. State staff have also been working with Deloitte developers to supplement the writing and testing of reports.

Below is a list of all current FNS required reports, an update on their status, and their scheduled or requested release date.

| FNS-46: Issuance Reconciliation Report- The report is used to account for benefits issued during a report month. This report is completed at each issuance reconciliation point and for each type of issuance system. | Status: Complete | Updates: Issued monthly |
| Comments/Summary of Fixes: The underlying scripts underwent code fixes; cosmetic and technical changes were made to the report template; the Functional and Technical Design Documents were updated accordingly. |

| FNS-101: Participation in Food Programs by Race- The report displays counts of all individuals who received SNAP in the fiscal year by race and ethnicity. | Status: Complete | Updates: Issued annually |
| Comments/Summary of Fixes: The report and design documents are currently under review by State SNAP staff for compliance with reporting requirements. Any code fixes or report updates will be prioritized into upcoming releases. |

| FNS-209: Status of Claims Against Households Report- This report covers the State's activities relating to recipient claims during the report quarter and the status of claims from previous reports. | Status: Not currently in production | Updates: Scheduled for release in August 2018 |
| Comments/Summary of Fixes: The report is currently pending the CCRU assessment. An additional detail level report has also been requested for July 2018. |

| FNS-366B: Program and Budget Summary Report: The report displays count of cases approved or denied for Initial Applications, Recertifications and Expedited Service for a month. It also shows the count of approved overdue applications bucketed in 1-30 Days, 31-60 Days, 61-90 Days and 91+ Days. | Status: | Updates: |
| Comments/Summary of Fixes: |
Status: Complete
Updates: This report is next scheduled to run in July 2018
Comments/Summary of Fixes: The report logic was updated to match federal regulations with the 3/24/18 release. Previous months’ reports were re-run to account for the update.

FNS-388: State Issuance and Participation Estimates Report- The report provides statewide estimates for issuance and participation for the current and previous month; the second preceding month will reflect actual or final participation data and revised estimates for issuance.

Status: Complete
Updates: Recently released, will be issued monthly
Comments/Summary of Fixes: The underlying scripts are undergoing code fixes to bring them into sync with logic in other SNAP reports; the Functional and Technical Design Documents are being updated accordingly.

FNS-583: SNAP Employment and Training Activity Report: The report displays number of work registrants receiving SNAP as of beginning of the quarter. It also displays number of New Work registrants, number of ABAWD applicants and recipients participating in qualifying, number of ABAWD case months for 15% exemption.

Status: Complete
Updates: Released quarterly
Comments/Summary of Fixes: The report batch is on hold until ABAWD data in the system has all been corrected. There is a large data fix/mass update for ABAWD set for June.

FNS-834: Direct Certification Rate Data Element Reports- The report displays count of school-aged children in SNAP households, SNAP children directly certified for free school meals and SNAP children in special provision schools operating in a non-base year for three months from October to December.

Status: Complete
Updates: Issued annually
Comments/Summary of Fixes: The underlying scripts underwent code fixes; cosmetic changes were made to the report template.

Additionally, the following reports are currently in design or development and are being prioritized for a summer release:

- Summary of Total EBT Cards Printed by Office
- Daily EBT Cards Printed by Office
- Expungement Report
- EBT Out of State Transactions by RL
- Food Stamp Monthly Payroll
- SNAP Mandatory Work Registrant Yearly Summary
- SNAP EBT Monthly Summary
- SNAP Payroll Transmission Recon
7.2 The State has failed to provide accurate data regarding program performance and operations, including lobby wait times and case-level data on unprocessed recertification’s.

In addition to the required SNAP reports described above, the State is working to prioritize outstanding requests for data regarding program performance and operations.

The State currently submits a report to FNS in advance of its weekly call with FNS staff and State leadership. The report includes the following metrics:

- Volume of SNAP Clients
- Volume of SNAP Tasks
- Average Wait Time of SNAP Clients
- Pending SNAP Case Documents
- SNAP Cases Terminated
- SNAP Benefit Issuance
- FNS-388 Report
- SNAP Recertification Packets Received
- Call Center Metrics
- Applications by Week Received
- Applications by Week Registered
- Online Applications by Week Received
- Weekly Determinations (by Channel)
- Expedited and Non-Expedited SNAP Timeliness by Week
- Days from Received to Registered
- Current Aging Snapshot of Work in Progress Applications

Over the course of the past several months, these metrics have undergone updates based on feedback from FNS and further evaluation by Deloitte and State staff.

Currently, there are outstanding issues with the following metrics:

- Volume of SNAP Clients – Due to system issues and differences in business process, the distinction between Drop Off and Lobby client volume is not accurate. A fix is being prioritized to combine Drop Off and Lobby into total Client Volume.
- Volume of SNAP Tasks – Due to system issues and differences in business process, the count of Lobby tasks is not accurate. Due to a known defect post 3/24/18 release, there is no data post week 3/25/18. The former is being prioritized for an upcoming data fix, the latter is scheduled to be fixed with the worker inbox release.
- Average Wait Time of SNAP Clients – The State is currently evaluating options for a queueing system that will allow for better measurement of client volume and wait time. Current lobby wait time data provided by the IES vendor is not believed to be accurate, or capture true business processes. However, we know from observation that the opening of the second lobby in Providence has reduced wait times significantly. PCG is currently completing a full baseline wait time assessment for the Department. This data will be shared with FNS once the assessment is completed.
- Pending SNAP Case Documents – The total for Change Documents is currently under review with Deloitte.
- Weekly Determinations by Channel – This metric is showing mostly null values for the channel that the application was received. This is because the information is not mandatory in data
collection. Going forward, this metric will focus on quantifying customer portal vs. non-customer portal submissions.

The State is also working with Deloitte to provide specific requests for data. The service requests are fulfilled by a combination of development and testing by Deloitte and State teams.

Below is a list of current FNS Data requests, an update on their status, and their scheduled or requested release date:

- Monthly Report of ALL Active SNAP Households beginning with month of September 2017 and each month going forward.
- This report is requested for June 2018 after the ABAWD fix.
- SNAP Work Registrants and ABAWD Data
  - The request has been proposed for July 2018, but Deloitte is current estimating the level of effort to prioritize for the June release.
- Monthly total issuance amount and household count comparison between Bridges and FIS
  - The request has been proposed for July 2018, but can likely be met by the SNAP Payroll Transmission Recon Report (mentioned above) proposed for July 2018.
- Case-level data on unprocessed recertifications is being prioritized.
- This request is a follow up to the Application, Termination, and Recertification Data required for the March 2018 FNS LPAR review. The request has been made of Deloitte to produce this extract of cases outside of a regular release window in May 2018.

**Claims, Collections and Recovery**

**8.1 Recipient Claims functionality has known defects and is currently inoperable**

Recipient Claims functionality has known defects and requested enhancements, but it is not currently being fully utilized. The State went through a 6-week end-to-end assessment of the claims functionality. This included workers from the field, members of the CCRU, Fraud, as well as financial management units. In addition to receiving training, the assessment team logged defects/enhancements that will be prioritized and scheduled for releases. The RI DHS team is meeting monthly with FNS to develop a claims management plan. CCRU functionality has been laid out as a theme within the release plan and weekly meetings between CCRU and Deloitte are taking place to prioritize the tickets and discuss appropriate solutions.

**8.2 Claims staff have not been adequately trained to use the new system**

Members of the CCRU staff underwent one on one training via the assessment. The State training team has also been notified of the CCRU assessment efforts and will be involved as issues are fixed so training materials can be created with the updated code.

**8.3 State is unable to properly track and update debts to the TOP system and has removed itself from TOP**

The State has completed UAT on the original design document. Gaps in the functionality were identified as part of the UAT effort and Business Requirement Requests (BRRs) were created. These BRRs will be prioritized after the claims functionality is confirmed to be working accurately. The State plans to have the TOP functionality implemented by March 2019. In addition, State staff plan to go through TOP online training through FNS so updates can be made directly on the site.

**8.4 Backlog of CCRU referrals identified that exist from INRHODES**
The backlog of referrals totals around 8,000. The CCRU staff has been closing referrals that are older than 6 years as well as organizing the backlog of paper files so there will be minimal delays updating RI Bridges once the claims functionality is operational.

Additional Customer Service Concerns

9.1 Call Center / Long Wait Time - Staffing Strategy

The RI DHS Call Center receives applicant and participant-initiated telephone calls regarding, among other things, information relevant to the SNAP program, current benefits and SNAP applications. When applicants and participants initiate a call to DHS, the Interactive Voice Response System (the “IVR”) offers callers the option to use the self-service IVR and follow automated prompts to obtain basic information about their benefits and the agency; or they can choose to speak with a representative. The call center number is also used for other state and federal human service benefit programs in addition to SNAP.

This number, 1-855- MY-RIDHS (1-855-697-4347), is provided to customers on eligibility notices, appointment letters and is located on our public facing website as the main number for all Regional Family Centers statewide (http://www.dhs.ri.gov/DHSOffices/index.php).

The RI DHS Call Center is currently composed of 26 staff: nineteen (19) Eligibility Technicians, one (1) clerk, one (1) Senior ET, two (2) Supervising Eligibility Technicians, and one (1) Senior Casework Supervisor. A Call Center Manager and the Deputy Director, Policy and Operations oversee the Call Center’s operations.

The Call Center has experienced some attrition over the past year due to agency-wide staffing churn. As a result, DHS is currently in the process of hiring additional staff. The Call Center will open 14 positions under a new classification called Eligibility Technician II. As described above, this classification requires prior employment as an Eligibility Technician (ET) for a term of at least 18 months, and qualified candidates are expected to have a higher level of knowledge and skills regarding both programs and system navigation. Because of the nature of inquiries to the Call Center (which often include cases with systematic problems), as well as the need for workers to have excellent customer service skills, a more advanced level of expertise is needed.

RI DHS has completed initial recruitment efforts consistent with terms in the Special Purpose Agreement and had 5 DHS Eligibility Technician II’s that started May 14th in addition to adding a third Supervising ET to manage and coach the Call Center staff. We’ll continue to recruit interested staff and once the proposed job descriptions are through the public hearing process we’ll post the remaining open positions for DHS Eligibility Technician II and convert the staff who applied and began in May to permanent DHS Eligibility Technician II positions.

When a customer first calls the RI DHS Call Center, they have the option to access the self-service IVR, through which they can receive the following information regarding SNAP:

- EBT balance, or report a lost/stolen card
- Application, recertification, or interim status
- Appointment confirmation
- Request a DHS form
- Office hours and locations

Customers can also choose to speak to a representative. If this option is chosen, the customer is routed to the AHS Triage team. The triage team asks basic questions regarding the reason for the call, and then
forwards the call into the appropriate queue in the Virtual Contact Center (VCC). The Triage team acts as a switchboard operator, offering customers an initial human touch when they reach the department. Once the call is placed in a specific queue, DHS Eligibility Technicians then pick up the call and address the customers’ issues from end-to-end.

Eligibility Technicians in the Call Center perform nearly all the same functions as ETs in the local field offices. They are responsible for:

▪ Processing new applications (only when a signature is viewable in the eligibility system)
▪ Processing Recertifications
▪ Processing Interims
▪ Processing change reports
▪ Determining eligibility
▪ Conducting interviews
▪ Requesting and processing verification documents
▪ Notifying clients of their benefit status
▪ Relaying general SNAP information
▪ Helping with notices

There is also at least one Eligibility Technician assigned per day to “coverage” tasks. The ET working on these tasks does not take incoming calls, but rather works on cases that may require additional actions once the call has concluded.

The Senior Case Work Supervisor and Supervising ETs, are all responsible for managing the work of the Call Center. They ensure ETs are each assigned to various queues in the VCC to accept incoming calls. The queues are organized by program type and language and the ETs are assigned to them based on their knowledge and training. The supervisors are also responsible for helping ETs troubleshoot issues and for escalating cases to the proper department personnel when necessary. They also complete supervisory duties in the Eligibility System, such as manual issuances, overrides, and approvals. In addition, the supervisors manage and distribute any work resulting from lists the AHS Triage team collects on a daily basis. These lists include: missed SNAP appointments, EBT card requests and case closures.

In order to comply with Special Master Sherman’s Order of March 2, 2018, RI DHS is in the process of seeking FNS approval to implement the use of a private company to augment and enhance current staffing levels and structure to provide basic case-specific information that is readily available in the system to a SNAP applicant or participant, such as application or case status, benefit issuance date, and status of submitted verifications. RI DHS believes this flexibility will provide improved customer service, reduce applicant and participant wait times, decrease workload on merit personnel staff, allow for better coordination across multiple human service programs, and comply with Special Master Sherman’s Order.

With FNS approval, RI DHS would like to contract with a vendor for an initial four (4) months of targeted work, in accordance with Special Master Sherman’s Order, to assist RI DHS with completing address changes in the system, data entry of reported changes from customers and interface matches, and to taking live calls from the Call Center specific to the services described below with FNS approval:

1. Handling Complaints (non-case specific)
2. General information on SNAP program, local offices and referrals.
3. Taking requests to replace forms and letters, including requests for blank new applications
4. Scheduling and rescheduling applications
5. Provide the following read-only information from the system - case and application status, receipt of documentation, benefit amount and date, case denial reason.

The Triage agents will be offering all callers the option of a Call Back vs. entering the queue after initial triage takes place. We asked the Vendor to add this capacity in their proposal as their hours of operation are longer than RI DHS’s office hours and we felt the option could be explored as our work progresses. For callers who opt to have a Call Back vs. waiting in the queue for these scenarios, RI DHS would send Call Back list to the Vendor.

The Vendor we are interested in has expertise in connecting clients and their constituents through seamless transactions on a massive scale across all BPO areas, including document processing for health and human services operations. They have extensive experience in providing and managing document processing for large clients including federal and state governments and commercial programs. The Vendor, with its expertise and extensive experience, recognizes that unworked documents and/or cases puts RI’s most vulnerable citizens at risk.

9.2 Request for Hearing and Informal Resolution

RI DHS must ensure that all fair hearings are scheduled, conducted, decided and all parties involved are notified of the hearing decision within 60 days from the date of the request. DHS must also ensure that the fair hearing case files are adequately document when all parties are notified of the hearing decisions.

RI DHS has been reviewing its implementation of the guidance on processing Appeals and Hearing Requests (DHS Transmittal 17-09) and has kicked off a team formation pilot to tackle backlog cases while ensuring we’re keeping up with processing current requests for hearings. We’re using the results of the pilot to guide the number of staff needed for assignment in the Worker Inbox once functionality is deployed.

Requests for Appeals are received by the State in various ways; regardless of how the agency receives the request RI DHS now has the functionality to support consistent processing of these requests timely (refer to the updated QRG). The State receives request in the following ways:

1. Customer completes a request via the Customer Portal and the DHS-121 is electronically submitted.
2. Customer completes a paper DHS-121 Request for an Appeal and mails it back to DHS.
3. Customer completes a paper DHS-121 Request for an Appeal and drops it off at DHS.

Requests for Appeals received in all local field offices are scanned onsite and processed by eligibility staff who complete an initial review of the request and when possible resolve the customers case issues through the informal resolution process.

Requests for Appeals received at the Scanning Center or entered directly into the Customer Portal and are processed by five (5) designated staff in a central location focusing on the backlog and implementing best practices for both the backlog and processing current requests. Two (2) full-time eligibility technicians are working timely receipt of requests using the search function in RIBridges. DHS is tracking the volume and processing in compliance with regulations to determine staffing ratio long-term. Thus far, the staff have been able to keep up with the volume of new requests entered in RIBridges from April 2018 forward. We have three full-time Senior Eligibility Technicians dedicated to working the backlog.

RI DHS and OHHS have close communication and are tracking backlog numbers and have a team of people working backlogged appeals.
Through working the backlog cases we’ve found that many customer issues have been resolved by processing changes/recertifications/interims; as well as through the informal resolution process, although the system generated task remains open. RI DHS is working with Deloitte and our data team to de-duplicate the data and refine the search criteria to identify cases that a Request for an Appeal has been received and the case has not been worked.

The resources dedicated to working the backlog are provided lists of scheduled hearings in advance of each Monday and Friday which have been dedicated to hearing days for backlog cases. The team is able to research and complete informal resolution on all scheduled hearings totaling 130 each week. Given the positive impact of the informal resolution process, there’s a significant increase in abandoned hearings as the customer issues are resolved prior to their scheduled hearing. DHS anticipates having completed the backlog appeals within three months.

The EOHHS Office data shows the increase in hearings scheduled. In April of 2017, the office scheduled around 300 requests for hearings. In April 2018, the number of hearings scheduled more than doubled to 866 hearings scheduled.

RI DHS recently conducted statewide site visits to obtain current baseline operations and reviewed revised streamlined business processes for handling Request for Appeals at the all staff quarterlies this past April. DHS is confident that with the spread of informal resolution processes, and reduction in backlog across all operational processing areas, there will be a significant decrease in the volume of Request for Appeals filed. We’re also structuring the staffing ratio to meet the volume of current Request for Appeals filed and processed timely.

9.3 Notices

Proper communication to clients regarding the expectations of SNAP applicants, on-going eligibility, and eligibility determination is integral to the work of administering the Supplemental Nutrition Assistance Program. Prior to and since the transition to the eligibility system, RI Bridges, the Department has worked internally and with community partners to improve readability of our notices. Since the transition to RI Bridges, our efforts to improve notices has also required extensive work to ensure the accuracy of our communications with clients.

The notices team meets weekly to discuss notices needing improvement across all programs and is actively communicating and engaging with the SNAP team to be certain all proposed improvements are agreed upon and being tracked and prioritized collectively. Additionally, as other changes are made to RI Bridges that require changes to notice text or triggers, we are taking the opportunity to review propose other improvements to the entire notice at that time.

A dozen SNAP notices are top priorities and are in the process of being improved with our vendor or are scheduled to be improved over the upcoming months. Included in those priority notices are the Benefit Determination Notice, Notice of Adverse Action, and Recertification forms as well as multiple ABAWD-related notices. Below are greater details of the notices.

**Benefit Determination Notice**

We are correcting the BDN in a multi-step process. Full compliance will require extensive work by Deloitte so we’ve identified a short term, interim process, which will provide more detail to clients while we work on the final product. Beginning in April, 2018, SNAP recipients with a change in benefits have seen a sentence on the first page of the notice indicating whether their benefits are increasing or decreasing and a general reason for their change in benefit (e.g. an increase or decrease of income
and/or benefits). This summer, the change in benefit language will be further improved to indicate the current benefit amount and new benefit amount as why the amount has changed. Rather than stating the change in benefit is due to an expense decrease it will indicate which expense decreased. The BDN will also begin to include the certification timeline with an end date rather than the current language that just includes a benefit start date. For example, a current BDN may indicate that a household’s benefit amount is certified “April 2018 through on-going”, in July the text will come into compliance by adding an end date where that same household’s notice will have language indicating the certification from “April 2018 through March 2019”.

**Notice of Adverse Action**

We implemented a Notice of Adverse Action that also acts as a renewal reminder in September 2017. Since that time, this reminder has been sent 15 days prior to the end of the certification period since that time. This summer, that notice will be updated to be more specific to where a recipient is in the renewal process. For example, following this update, the notice which currently reads, “you have either not returned your packet or your renewal has not been processed” will be personalized so that individuals who have not returned a packet will receive a notice stating that and those who have returned a packet but have not completed the interview, will have that stated in the notice. The intent in personalizing the notices is to help our clients better understand what actions they need to complete in order to have a benefit determination made.

**Recertification**

Previously mentioned data clean-up efforts ensure that recertification packets are received according to FNS policy. RI DHS is implementing additional processes to monitor the number of packets issued each month to monitor for potential additional problems.

**ABAWD Notifications**

Several notices have been crafted to fully and clearly explain SNAP policies to Able-Bodied Adults without Dependents. With an expected 13 cities and towns losing their geographic waiver this fall, many adults will experience a time limit for the first time. We’ve worked to create new notices explaining the policy and the exemptions available while tailoring messages to different individual experience.

**Backlog of several thousand pieces of returned mail and processed documents awaiting indexing**

10. **1 Electronic Document Management (EDM): Addressing Processing Deficiencies**

**Root Cause of Processing Deficiencies**

When RIBridges was implemented in September 2016, the plan was for all DHS field offices to scan documents while the customer waited to be seen by an Eligibility Technician (ET). The ET was then supposed to work the case using the scanned documents to ensure they were all readable and all documents were in fact scanned. Several operational challenges led to the development of a backlog of processed documents and undeliverable mail.

**Current Backlog**

<table>
<thead>
<tr>
<th>Processed Documents (1)</th>
<th>Number of Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Processed Documents are documents data has been entered into RIBridges and a benefit determination has been made. The paper documents need to be scanned to support the benefits issued.

Undeliverable Mail is mail sent by DHS/OHHS/HSRI to the customer’s address on file in RIBridges and is returned to the State because the customer is no longer living at that address.

Current and Planned Staffing

<table>
<thead>
<tr>
<th>DHS Staff (1)</th>
<th>Current Staffing</th>
<th>Planned Staffing</th>
<th>Number of Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Scanning – Customer Service Aides</td>
<td>6</td>
<td>5 (Approximate Start Date: June 11th)</td>
<td>11</td>
</tr>
<tr>
<td>Central Scanning – Summer Interns</td>
<td>0</td>
<td>3 (Approximate Start Date: June 4th)</td>
<td>3</td>
</tr>
<tr>
<td>ORS (50% Time)</td>
<td>2</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td><strong>TOTAL STAFF</strong></td>
<td></td>
<td></td>
<td><strong>17</strong></td>
</tr>
</tbody>
</table>

Proposed Staffing for Processed Documents and Returned Mail

<table>
<thead>
<tr>
<th>Processed Mail (3)</th>
<th>Number of FTE’s</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central Scanning Customer Service Aides</td>
<td>2</td>
</tr>
<tr>
<td>Central Scanning Summer Interns</td>
<td>2</td>
</tr>
<tr>
<td>ORS</td>
<td>3</td>
</tr>
<tr>
<td><strong>TOTAL FTE’s</strong></td>
<td><strong>7</strong></td>
</tr>
</tbody>
</table>

(1) Processed Documents are documents data has been entered into RIBridges and a benefit determination has been made. The paper documents need to be scanned to support the benefits issued.

(2) Undeliverable Mail is mail sent by DHS/OHHS/HSRI to the customer’s address on file in RIBridges and is returned to the State because the customer is no longer living at that address.
On average, a worker can index 15 processed Documents per hour.

On average, a worker can index 20 Undeliverable Documents per hour.

As available, additional staff will assist with indexing Undeliverable Mail when Processed Mail is completed.

**Assumptions**

- Field Offices scan all documents received in their offices and do not sent any documents other than Undeliverable Mail to Central Scanning.
- Staffing levels are achieved.

**Strategies for Addressing Root Causes of Deficiencies**

In the June/July 2017 timeframe, 2 major improvements were made to the EDM process. The first was the automation of the Undeliverable Mail by reading the “QR” code on the piece of undeliverable mail, taking a picture of the outside of the envelope, and having Deloitte automatically upload the documents into the electronic case file (ECF) for that individual. This automation eliminated the need to manually scan and index 90% of all the undeliverable mail.

The second major enhancement was the introduction of smart separator sheets at Central Scanning. The smart separator sheet, when used with a document containing a “QR” Code, will allow for documents to automatically index by reading the case number contained in the “QR” Code. This will help reduce the amount of manual errors because it eliminated the need for workers to manually type in the case number.

With the upcoming late summer release of new RIBridges functionality, the field offices with all be scanning their own documents as well as utilizing smart separator sheets.
We are also in the process of backfilling the current vacancies in addition to utilizing staff in another business unit to assist with the backlog.

**Proposed Alternative Approaches to Processing Documents**

**Processed Documents**

**Overview**

Processed Documents are documents from which data has been entered into RI Bridges and a benefit determination has been made. The paper documents need to be scanned to support the benefits issued.

The data in Table 1 illustrates the backlog of Processed Documents that need to be worked.

<table>
<thead>
<tr>
<th>Table 1</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Processed Documents (As of May 3, 2018)</strong></td>
<td><strong>Number of Documents</strong></td>
</tr>
<tr>
<td>Total Number Scanned, Not Indexed</td>
<td>59,332</td>
</tr>
<tr>
<td>Estimated Number Prepared, not scanned, or Indexed</td>
<td>3,000</td>
</tr>
<tr>
<td>Estimated Number to be Prepared, Scanned and Indexed</td>
<td>9,000</td>
</tr>
<tr>
<td><strong>TOTAL TO BE PROCESSED</strong></td>
<td><strong>71,332</strong></td>
</tr>
</tbody>
</table>

**Current Process**

The current process for indexing Processed Documents is for a worker to manually-and separately-index each page of a document. For example, if a recertification was received with a paystub and some expense pages, the worker would manually index the recertification, the paystub and the expense separately.

**Proposed One-Time Process**

With the upcoming late summer 2018 release, all field offices will be scanning and indexing all their own mail. As a result, processed mail will no longer be sent to the Central Scanning Center. As Central Scanning currently indexes the backlog of 71,000 pieces of mail, we have estimated that a worker can index on average 10-15 documents per hour.

As an alternative one-time approach to clearing this backlog, DHS suggests that we index all documents received in a packet to the main case document. For example, if a recertification was received with a paystub and some expenses, we would index all documents to the recertification instead of individually indexing each separate component or document.

The justification for this approach is as follows:

- All data entry into RI Bridges has already occurred and benefits have been issued
- The need to access the supporting documents would primarily be for audits
- All pages of the documents would still be accessible
This approach would save a minimum of 50% of the time required to index documents. If DHS staff indexed all the processed documents as “other” for this backlog, it would set them apart from most other documents.

Staff would need to be notified that, when looking for historical documents between September 2016 and the implementation of this process, they should check all documents labeled “other”. We have confirmed with Deloitte that no additional system changes will be necessary to implement this change.

**Undeliverable Mail**

Undeliverable Mail is mail sent by DHS/OHHS/HSRI to the customer’s address on file in RIBridges and is returned to the State because the customer is no longer living at that address.

The data in Table 2 illustrates the backlog of Processed Documents that need to be worked.

<table>
<thead>
<tr>
<th>Table 2.0</th>
<th>Number of Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undeliverable Mail</td>
<td></td>
</tr>
<tr>
<td>Total Number Scanned, Not Indexed</td>
<td>27,167</td>
</tr>
<tr>
<td>Estimated Number to be Prepared, Scanned and Indexed</td>
<td>4,000</td>
</tr>
<tr>
<td><strong>TOTAL TO BE PROCESSED</strong></td>
<td>31,167</td>
</tr>
</tbody>
</table>

**Proposed One-Time Processes**

*Removal of tasks generated through Automated Returned Mail Process*

Approximately 160,000 tasks have been created in the Return Mail Queue. DHS would propose to remove the 160,000 tasks that were created based upon the following:

- A copy of the returned envelope image is in the Electronic Case File (ECF) for each of these cases.
- The majority of the tasks were created in 2017 when the backlog of undeliverable mail was processed using the new automated process which eliminated the need to open, sort, scan and index manually.
- Approximately only 5% of the undeliverable mail has a forwarding mail address on them and at this point in time, most of the addresses would not be timely.

*DHS requests a waiver to not scan or index the remaining 31K pieces of Undeliverable Mail* - Given that The majority of the 27,000 documents are pre-July 2017 going back to the implementation of RIBridges and that Any forwarding information contained on the outside envelope would be stale information. DHS requests a waiver to not scan or index the remaining 31K pieces of Undeliverable Mail and would instead implement a one-time address verification process using USPS data against any case that has not had an eligibility determination completed in the last year. This one-time process would allow RIDHS to validate all current customer addresses and would catch any missed address updates.
System Functionality

11.1 System Functionality Workarounds

Every defect that impacts eligibility determination must have either a viable workaround or be escalated for an immediate fix. Workaround is defined as a “viable method to circumvent a defect until that defect can be resolved”. The establishment of a workaround is a six-step process. Step one is identifying the workaround. Identification occurs either in the field office or by the Deloitte Application Development team triaging a defect. Next, the workaround steps are documented. The training team is responsible for formatting content and preparation of testing materials. Testing is the third step and essential in the process. The Deloitte testing team confirms the instructions are correct and the method is not only viable but does not create negative downstream issues. Once tested the training team produces training materials for state approval. The sixth step is to publish the workaround in OnlineHelp. Staff utilizing the workaround receive written training materials, verbal review at morning huddles, supervisory coaching, on-site support and OnlineHelp within RIBridges.

The workaround is tracked with the JIRA and monitored through the JIRA dashboard. Following a defect fix, Deloitte and the state determine if the workaround is no longer needed. The workaround is then retired.

Since September 2017, DHS has retired twenty-six (26) workarounds. There are currently three (3) active workarounds and five (5) in the establishment process.

Workaround Status (4/30/18)

Agency/Pending Clarification for Valid Workaround/Active Workarounds in Field/Retired Workarounds (Since Sept. 30, 2017)

<table>
<thead>
<tr>
<th>Agency</th>
<th>Pending Clarification for Valid Workaround</th>
<th>Active Workarounds in Field</th>
<th>Retired Workarounds (Since Sept. 30, 2017)</th>
</tr>
</thead>
<tbody>
<tr>
<td>DHS</td>
<td>5</td>
<td>3</td>
<td>26</td>
</tr>
<tr>
<td>HSRI</td>
<td>0</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>EOHHS</td>
<td>0</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>5</strong></td>
<td><strong>7</strong></td>
<td><strong>36</strong></td>
</tr>
</tbody>
</table>
11.2 System fixes are improperly tested or are implemented with known defects that result in additional system issues

In order to improve quality, Deloitte and the State must make continued improvements to testing. The State is committed to testing as many defect tickets as possible for each release. During the month of April, the State added 24 entry-level testing staff via a contractor to execute more test scripts in UAT. Over the next few months, the State has asked KPMG to add 6 staff to support test scripting and executive oversight. These resources will be onboarded in June and are expected to contribute to releases after June. The State is also working with KPMG on the possibility of automating UAT regression and is awaiting a proposal from the vendor. Finally, The State recently requested that CSG (IV&V vendor) perform a focus area assessment on Deloitte SIT processes. The outcome of this assessment will be implementation of recommendations and monitoring of results/process improvements.

To fund these resources, the State reviewed existing UHIP contracts for potential savings to re-deploy resources to areas of highest need, including testing. Further, the State, through KPMG, is expanding its regression suite. Finally, the State is planning to launch “Business Simulation” testing for each release where eligibility technicians will work cases end-to-end in the testing environment to identify any issues that may have been introduced by new code and not caught, for whatever reason, by the regression suite.

We have also made process improvements on testing. Deloitte and the State have introduced a test planning tool which is capturing the scope of both SIT and UAT testing including the scenarios and scripts to be executed. Planning meetings are being held on a weekly basis with the IT Leadership team to discuss testing coverage for each release and to review overall progress and surfacing issues/challenge being faced by the testing teams. Finally, the State and Deloitte have introduced a release planning checklist and continue to iterate on it to ensure that we learn from each release. Finally, the State and Deloitte abide by their ITIL based governance process to highlight deficiencies and make go/no-go decisions before releases are put into production. Consequently, should release fail SIT or UAT for whatever reason, they are not put into production without first clearly and transparently understanding the risks and issues presented by the testing team for executive review.

The State and Deloitte are making changes to test planning and execution to improve quality before delivery. Deloitte has brought a best practice set of core regression test scenarios to validate the system with each release to help prevent “breaking” core functions as fixes and new functionality are released. This core regression test suite will continue to be reviewed and enhanced with input from the State program unit owners to continuously improve the overall coverage of the scenarios and cover unanticipated issues discovered in releases. The core regression test scenarios are currently “manually” operated, but Deloitte is automating them which will allow more comprehensive testing in shorter timeframes. Deloitte has represented to the State that these will be operational and running for releases in June.

To understand whether these efforts are working, the State and Deloitte look at “injection” of tickets and defects following each release, looking to ensure that there are not spikes following each release. These numbers are provided weekly in the Deloitte Executive Status deck.

11.3 System currently lacks functionality required for State to meet federal regulations

The joint RI DHS and Deloitte teams have done substantial work to improve RIBridges’ compliance with federal regulation (see Attachment A for the documentation of functionality already introduced). Most recently, the joint prioritization process focused on ensuring all required compliance functionality is
scheduled as part of the updated runway to be produced. See Attachment B the thematic release plan which documents the likely sequence of how this functionality will be implemented.

In closing, I appreciate the opportunity to provide the FNS team with this update and am grateful for the support your team has provided to RI DHS in our implementation of RIBridges. Please let me know if you need further information or explanation about anything contained in this response. On behalf of the team at RI DHS, we look forward to all that we know we will accomplish in the coming year.

Sincerely,

Courtney Hawkins
Director, RI DHS

cc: Bonnie Brathwaite, Matt Henschel, Maria Volpe